

**EXHIBIT A**

**Proposed Order**

THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: ) Chapter 11  
)  
W. R. GRACE & CO., et al.,<sup>1</sup> ) Case No. 01-1139 (AMC)  
) (Jointly Administered)  
Reorganized Debtor. )  
Re: Docket No.: \_\_\_\_\_

**ORDER GRANTING MOTION TO SHORTEN NOTICE PERIOD AND SCHEDULE  
HEARING ON THE REORGANIZED DEBTOR'S EMERGENCY MOTION FOR  
AN ORDER FINDING THAT RUNE KRAFT IS IN CONTEMPT OF THIS COURT  
BY HAVING WILLFULLY AND KNOWINGLY VIOLATED THIS COURT'S  
CONFIRMATION ORDER AND ITS ORDER OF AUGUST 26, 2021 [DOCKET NO.  
33256] BY FILING A MOTION FOR AN ARTICLE III COURT'S  
REVIEW OF THIS COURT'S AUGUST 26 ORDER**

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Upon consideration of the motion (the "Motion to Shorten")<sup>2</sup> filed by the above captioned Reorganized Debtor (the "Reorganized Debtor") for entry of an order (this "Order") scheduling a hearing on, and shortening the notice period of, *The Reorganized Debtor's Emergency Motion for an Order Finding that Rune Kraft is in Contempt of This Court By Having Willfully and Knowingly Violated This Court's Confirmation Order and Its Order of August 26, 2021 [Docket No. 33256] By Filing a Motion for an Article III Court's Review of This Court's August 26 Order* (the "Emergency Motion"); and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that venue of this proceeding and the Motion to Shorten in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that notice of the Motion to Shorten was

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<sup>1</sup> W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or "Grace") is the sole remaining "Reorganized Debtor," and Case No. 01-1139 is the sole remaining open chapter 11 case (the "Grace Chapter 11 Case").

<sup>2</sup> Capitalized terms not defined herein shall have the meaning ascribed to them in the Motion to Shorten.

appropriate and no other notice need be provided; and this Court having reviewed the Motion to Shorten and having determined that the legal and factual bases set forth in the Motion to Shorten establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion to Shorten is GRANTED.
2. The hearing on the Emergency Motion will be held on **September 8, 2021 10:00 a.m. (Eastern Time)** (the “Hearing”).
3. Notice of the Emergency Motion as provided therein shall be deemed good and sufficient notice of such Motion.
4. Any responses or objections to the relief requested in the Emergency Motion shall be made prior to or at the Hearing.
5. The Reorganized Debtor is authorized to take all actions necessary to effectuate the relief granted in this Order Shortening Notice.
6. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order Shortening Notice.